

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Petition of AT&T Inc. for Forbearance Under	)	WC Docket No. 07-139
47 U.S.C. §160(c) from Enforcement of	)	
Certain of the Commission's ARMIS	)	
Reporting Requirements	)	

**COMMENTS OF QWEST CORPORATION**

Pursuant to the Federal Communications Commission's ("Commission") Public Notice,<sup>1</sup> Qwest Corporation ("Qwest") is filing these comments in support of AT&T Inc.'s ("AT&T") petition requesting that the Commission forbear from enforcing certain ARMIS reporting requirements.<sup>2</sup>

In its petition, AT&T requests that the Commission forbear from requiring AT&T to file ARMIS quality of service and infrastructure reports, ARMIS Reports 43-05, 43-06, 43-07 and 43-08.<sup>3</sup> AT&T points out that the Commission's original rationale for adopting these ARMIS reports (*i.e.*, to monitor the transition to price cap regulation) has long ceased to exist.<sup>4</sup> Furthermore, AT&T notes that the Commission proposed eliminating the bulk of ARMIS Reports 43-05 and 43-06 in 2000 in its Notice of Proposed Rulemaking in Phase 3 of the *Accounting Simplification Proceeding*.<sup>5</sup>

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<sup>1</sup> Public Notice, *Pleading Cycle Established for AT&T Inc. Petition on Behalf of Its Incumbent LEC Affiliates Seeking Forbearance from Enforcement of Certain ARMIS Reporting Requirements*, WC Docket No. 07-139, DA 07-3332, rel. July 20, 2007.

<sup>2</sup> AT&T Inc. Petition for Forbearance, *In the Matter of Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) from Enforcement of Certain of the Commission's ARMIS Reporting Requirements*, filed June 8, 2007 ("AT&T petition").

<sup>3</sup> *Id.* at 1.

<sup>4</sup> *Id.* at 3-4.

<sup>5</sup> *Id.* at 4, 9.

Simply stated, sixteen years after the transition to price cap regulation for local exchange carriers (“LECs”), the ARMIS quality of service and infrastructure reports are not necessary to ensure that quality of service will not deteriorate under price cap regulation -- versus what it had been under rate of return regulation. Qwest supported the elimination of unnecessary ARMIS reports in its comments in the Commission’s *Phase 3 NPRM*<sup>6</sup> in its biennial regulatory review under Section 11 of the Act<sup>7</sup> and that support continues.<sup>8</sup>

Respectfully submitted,

QWEST CORPORATION

By: /s/Timothy M. Boucher  
Craig J. Brown  
Timothy M. Boucher  
Suite 950  
607 14<sup>th</sup> Street, N.W.  
Washington, DC 20005  
(303) 383-6608

Its Attorneys

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<sup>6</sup> Qwest Reply Comments, filed May 7, 2002, *In the Matter of 2000 Biennial Regulatory Review – Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 2 and Phase 3*, CC Docket No. 00-199, *Notice of Proposed Rulemaking*, 15 FCC Rcd 20568 (2000) (“*Phase 3 NPRM*”).

<sup>7</sup> Section 11 requires that, in every even-numbered year, the Commission review its regulations and “determine whether any such regulation is no longer necessary in the public interest as the result of meaningful economic competition between providers of [telecommunications] service.” 47 U.S.C. § 161(a)(2).

<sup>8</sup> In a written *ex parte*, dated February 3, 2005, Qwest urged the Commission to re-direct its attention to Phase 3 of the *Accounting Simplification Proceeding* including eliminating unnecessary ARMIS reports. See letter from Melissa E. Newman, Vice President - Federal Regulatory, Qwest, to Jeffrey Carlisle, Chief, Wireline Competition Bureau, Federal Communications Commission, dated February 3, 2005, *2000 Biennial Regulatory Review – Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirements for Incumbent Local Exchange Carriers: Phase 2 and Phase 3*, CC Docket No. 00-199; *Local Competition and Broadband Reporting*, CC Docket No. 99-301, at 4-5.

CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **COMMENTS OF QWEST CORPORATION** to be: 1) filed via ECFS with the Office of the Secretary of the FCC in WC Docket No. 07-139; 2) served via e-mail on Alan Feldman, Industry Analysis and Technology Division, Wireline Competition Bureau at [alan.feldman@fcc.gov](mailto:alan.feldman@fcc.gov); and 3) served via e-mail on the FCC's duplicating contractor Best Copy and Printing, Inc. at [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com).

/s/Richard Grozier

August 20, 2007